

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

DANIEL LOVELACE AND HELEN
LOVELACE

Plaintiffs,

vs.

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
DR. BABU RAO PAIDIPALLI &
DR. MARK P. CLEMONS

Defendants.

Case No. 2:13-CV-02289-JPM-dkv

**METHODIST HEALTHCARE – MEMPHIS HOSPITALS' MOTION FOR
PROTECTIVE ORDER**

COMES NOW non-party Witness Methodist Healthcare – Memphis Hospitals (“Methodist”), by and through undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, files this Motion for Protective Order, seeking to prohibit counsel for Defendants Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D. (“Defendants”) from participating in *ex parte* communications with Elesia Turner, Clinical Risk Manager for Methodist Le Bonheur Children's Hospital. In support of its Motion, Methodist relies upon its contemporaneously filed Memorandum of Law in Support of this Motion and the entire record in this case.

Respectfully submitted,

s/ Craig C. Conley

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CERTIFICATE OF CONSULTATION

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Rule 7.2(a)(1)(B), I hereby certify that, on December 16, 2013, counsel for Methodist conferred with counsel for Defendants via e-mail concerning the contents of this Motion.

s/ Craig C. Conley

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of December, 2013, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

s/ Craig C. Conley